

October 27, 2024

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Freeman et al. v. Giuliani*, No. 24-mc-353 (LJL)

Dear Judge Liman,

Plaintiffs Ruby Freeman and Wandrea' Moss respectfully submit this letter to update the Court as to the status of discovery in connection with Intervenor-Defendant Andrew H. Giuliani's claim to the contested World Series Rings. Plaintiffs and Intervenor Defendant have conferred and are able to jointly report as follows:

Plaintiffs have served discovery requests on Intervenor, who has committed to respond by October 27, 2024. Counsel for Plaintiffs and Intervenor are in contact about scheduling Intervenor-Defendant's deposition and any further discovery that may be necessary, in anticipation of trying any outstanding disputes before the Court on January 16, 2025.

Respectfully submitted,

s/ Aaron E. Nathan